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Attorneys for Plaintiff,
Gar0 Daldalian

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**GARO DALDALIAN,
Individually and On Behalf of
All Others Similarly Situated,**

Plaintiff,

v.

**PEPSICO, INC., CONOPCO,
INC. d/b/a UNILEVER, and
PEPSI LIPTON
PARTNERSHIP d/b/a PURE
LEAF TEA,**

Defendants.

Case No.: 2:25-cv-01491-WLH-E

**JOINT STIPULATION TO DISMISS
ACTION PURSUANT TO
FED. R. CIV. P. 41(a)(1)(A)(ii)**

1 Plaintiff GARO DALDALIAN (“Plaintiff”) and Defendants PEPSICO, INC.,
2 CONOPCO, INC. d/b/a UNILEVER, and PEPSI LIPTON PARTNERSHIP d/b/a
3 PURE LEAF TEA (“Defendants”) (together, the “Parties”), through their respective
4 counsel of record, jointly stipulate and request dismissal of Plaintiff’s individual claims
5 against Defendants *with prejudice* and dismissal of the putative class members’ claims
6 *without prejudice*, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

7 The Parties further agree to bear their own respective fees and costs.

8
9 Dated: September 25, 2025

KAZEROUNI LAW GROUP, APC

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11 By: s/ Pamela Prescott, Esq.
12 Abbas Kazerounian, Esq.
13 Pamela Prescott, Esq.
14 *Attorneys for Plaintiff*

15 Dated: September 25, 2025

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16 By: /s/ Jasmine Wetherell, Esq.
17 Jasmine Wetherell, Esq.
18 *Attorneys for Defendants*

19 **SIGNATURE CERTIFICATION**

20 Pursuant to L.R. 5-4.3.4(a)(2), I hereby certify that the content of this document
21 is acceptable to all parties who are required to sign this stipulation. All counsel have
22 authorized me to affix their signatures to this document.

23 By: /s/ Pamela E. Prescott, Esq.
24 Pamela E. Prescott, Esq.